



Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037

O +1 202 457 6000
F +1 202 457 6315
squirepattonboggs.com

Paul Besozzi
T +1 202 457 5292
Paul.Besozzi@squirepb.com

VIA ECFS AND IBFS

July 21, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Joint Application to Transfer Domestic and International Section 214 Authorizations, WC Docket No. 17-126; ITC-T/C-20170511-00094; ITC-T/C-20170511-00095 - Securus Investment Holdings, LLC; Securus Technologies, Inc.; T-NETIX, Inc.; and T-NETIX Telecommunications Services, Inc.

Dear Ms. Dortch:

Securus Investment Holdings, LLC; Securus Technologies, Inc.; T-NETIX, Inc.; and T-NETIX Telecommunications Services, Inc. (collectively “STI”); and SCRS Acquisition Corporation (“SCRS”) (collectively, with STI, the “Applicants”), by and through the undersigned counsel, and per the request of certain staff in the Federal Communications Commission Wireline Competition Bureau (“WCB”),¹ hereby provide information on STI prospective and existing services and programs to benefit both the inmate and law enforcement communities that STI serves. STI fully expects to implement and continue to support these initiatives with resources provided by the proposed transferee.

¹ On July 19, 2017, representatives of the Applicants met with certain FCC staff to discuss the above referenced pending joint applications. A notice of ex parte will be timely filed in accordance Section 1.1206 of the Commission’s rules. 47 C.F.R. § 1.1206.

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POST-CLOSING INITIATIVES

“Find A Job” Assistance Program

Within the first 12 months following the transfer of control, STI will invest approximately \$6 Million in programs to assist inmates prior to being released from jail/prison in finding and applying for jobs that they would begin post release. Nearly 650,000 people are released from state and federal prison yearly, and far greater numbers reenter the job market from local jails; each of them need a job. Through this investment, STI is committed to assisting soon to be released inmates in (i) nationwide job searches; (ii) matching skills to available jobs; and (iii) getting jobs—all of which will have a direct impact on reducing recidivism. This will be a free-of-charge service.

State Department Of Corrections Offerings.

Within the first 12 months following the transfer of control, STI will invest up to \$5 million in connection with programs with one or more state departments of correction systems (“DOC”) which will include the following features:

- **Inmate Tablets.** STI will provide approximately 10,000-15,000 inmate tablets free of charge, pre-loaded with DOC-approved and authorized content, including off-line entertainment, as well as educational and religious content. Such tablets will also allow inmates to place telephone calls at normal rates via the tablet from their cell, while maintaining all security requirements.
- **Tablet Administrators.** STI will provide full-time tablet administrators free of charge to facilitate the tablet program at the direction of the DOC. These individuals will operate within the guidelines set forth by DOC personnel and will assist the DOC staff in delivering meaningful learning opportunities to the inmate population.
- **CellSense Detection Devices.** STI will provide approximately 100 CellSense detection devices, manufactured by MetraSens free of charge to the DOCs, to help combat contraband cell phones. CellSense is a portable, ferrous-metal detection system that detects all cell phones regardless of if it is switched on or off or concealed in a body cavity. It also alerts to other ferrous metal contraband on/in inmates such as shanks, knives, razors, lighters, tattoo guns . . . etc. CellSense conducts a full body scan in a single walk-by and can screen up to 30 people per minute. It can also be placed horizontally to quickly screen mattresses, laundry, and mail or hung up on the wall to screen staff and visitors.
- **Investigative Support.** Through STI’s industry-first team of more than 100 highly trained analysts, STI will monitor an agreed upon percentage (e.g., up to seven percent (7%)) of all inmate calls and provide live, real-time investigative analysis to

establish links between selected inmates and called parties and to identify activities such as gang, drug, victimization, extortion, and other nefarious activities.

- **Call Pattern Analysis and Alerting with THREADS.** In addition to the investigative support, STI will utilize the only call pattern analysis and alerting solution that was designed and built exclusively for law enforcement and corrections use to identify trends within inmate calling patterns and issue an indicator when pattern changes occur.
- **Voice Recognition, Identification, and Analysis Using STI's Investigator Pro (IPRO).** Using first-in-the-industry ability to identify, not just that multiple inmate voices appear within a call, but to identify and report the names of all inmate voices that appear within a call, Investigator Pro will verify the inmate identity via voice identification and continuously monitor every call to identify additional/different voices throughout the call.
- **Compare Called Parties by Voice with Searchable Voice.** This exclusive feature of *IPRO* compares called parties by voice and identifies potential matches for all inmate calls statewide. It gives investigators the ability to select a voice sample from either the inmate or called party side of an inmate's telephone call and then use that sample to search for all other calls where that voice occurs.
- **MBE/WBE Participation.** STI recognizes the importance of partnering with organizations that have historically been underutilized or disadvantaged in the workforce, such as Minority Business Enterprise (MBE) and Women Business Enterprise (WBE). STI is committed to continued inclusion of and partnering with state-certified M/WBEs in providing services to the DOCs.

POST-CLOSING CONTINUED SUPPORT FOR EXISTING PROGRAMS

STI will use access to post-closing resources to continue the following existing programs:

- **Free Inmate Calls.** STI provides inmates with approximately 180 million free calls, per year. In Alaska, STI provides 10,000 free calls per month for indigent inmates.
- **Educational and Rehabilitative Tablet Content.** Where permitted by facility administrators, STI offers inmates the opportunity for tablet-based education and rehabilitation programs, including GED and other educational courses, as well as access to job search applications. These programs allow inmates to advance their education and search for post-release employment opportunities. STI's tablet program also includes self-improvement tools, including books and podcasts.

- **Law Library.** Where permitted by facility administrators, STI provides inmates with access to complete federal- and state-specific law libraries, through STI's tablets and inmate terminals, allowing for easy electronic research and analysis.
- **Prison Entrepreneurship Program.** STI works with the Prison Entrepreneurship Program, which provides unparalleled resources and real-world values-based business skills to inmates so that inmates reintroduced into society have the tools, skills, and support structure to pursue healthy, fulfilling, and productive lives.
- **Correctional Officer Memorial Fund.** This fund provides financial assistance to grieving families of non-administrative correctional officers who have fallen in the line of duty at any of STI's customer facilities, including payment of one year's salary to the families of fallen officers.
- **The Securus Foundation.** The Securus Foundation is a recently launched non-profit foundation dedicated to reducing recidivism rates and modernizing the re-entry process for returning citizens.
- **United Way Contributions.** STI associates contributed more than \$437,000 in 2017 (some portion of which is directed to inmate education programs) to make the company's total nine-year commitment more than \$1.7 million.

With the completion of the transfer of control and the financial backing of Platinum, Securus believes that it will be better able to continue existing benefits and work toward adding further benefits to those listed. With the new financial backing Securus expects it will have a greater ability to advance its research, develop new technology, and continue to fund programs that benefit inmates, families, friends, and the public.

Respectfully submitted,



Paul C. Besozzi

Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037
202-457-5292

Counsel for Securus Investment Holdings, LLC; Securus Technologies, Inc.; T-NETIX, Inc.; and T-NETIX Telecommunications Services, Inc.

cc: Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Brendan Carr, General Counsel
Kris Monteith, Chief, Wireline Competition Bureau

Tom Sullivan, Chief, International Bureau
Jay Schwarz, Office of Chairman Pai
Kristine Fargotstein, Office of Chairman Pai
Jim Bird, Office of General Counsel
Madeleine Findley, Wireline Competition Bureau
Daniel Kahn, Wireline Competition Bureau
Jodie May, Wireline Competition Bureau
Sherwin Siy, Wireline Competition Bureau
Tracey Wilson, Wireline Competition Bureau
David Krech, International Bureau
Sumita Mukhoty, International Bureau
Lee G. Petro, Counsel for Petitioners
William B. Wilhelm, Counsel for Transferee